

## **EXHIBIT C**

## Fleming, Lindsay A.

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**From:** Robert Brennan <rbrennan@brennanlaw.com>  
**Sent:** Thursday, July 1, 2021 6:01 PM  
**To:** Barton, Eric; Fleming, Lindsay A.  
**Cc:** Robert Brennan; Robert Bichler  
**Subject:** Nicolette v. Equifax

[EXT. Sender]

Mr. Barton, Mr. Fleming,

The premise of the [REDACTED] settlement with Equifax was the following email Mr. Barton sent to me:

Mr. Brennan-

The Nicolette case is nearly identical to Lubinsky and Chaine, both of which involved multiple disputes and settled for [REDACTED]. Equifax also never paid for a "filing fee" for any of those settlements.

Therefore, consistent with numerous prior settlements, please let me know if we can wrap this one up for [REDACTED]. Also, please confirm we can settle Pavel for [REDACTED] as well.

(End of Barton email)

Today we learn that EFX failed to send an ACDV to Tesla for Mr. Nicolette's dispute. His case is nowhere near "nearly identical" to Lubinsky and Chaine.

Mr. Nicolette does not agree to the settlement under these circumstances. Mr. Nicolette has authorized me to issue a new demand of [REDACTED], Equifax only.

We filed a notice of settlement, at your request, in this matter, which needs to be rescinded unless Equifax promptly engages in more meaningful settlement discussions. I am of course hoping that we can rescind the notice of settlement by stipulation, but otherwise I will need to file an ex parte to rescind the notice of settlement.

For the future, I will need to see the EFX documents before agreeing to any settlement on any Tesla case and on any case at all. Seeing the EFX basic document production first will permit me to correctly counsel my clients about the circumstances of each case.

Thank you for your attention to this matter.

Bob Brennan

Robert F. Brennan, Esq.  
Law Offices of Robert F. Brennan, APC  
2103 Montrose Ave. Suite D  
Montrose, Ca. 91020

(818) 249-5291  
Fax (818) 249-4329

*17 Consecutive Years Southern California Super Lawyer; Eleven Consecutive Years Pasadena Top Attorney  
Rated "AV Preeminent Attorney" by Martindale-Hubbell  
Life Member, Million Dollar Advocates Forum  
Life Member, Multi-Million Dollar Advocates Forum  
Associate Member, American Board of Trial Advocates (ABOTA)*

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- FALSE INFORMATION ON CREDIT REPORTS (FAIR CREDIT REPORTING ACT).
- LEMON LAW (CARS, RV'S MOTORCYCLES, BOATS).
- CAR DEALER FRAUD CASES.
- IDENTITY THEFT CASES.
- ELDER FINANCIAL ABUSE.
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